

1:23 MJ 4163

**AFFIDAVIT OF PROBABLE CAUSE IN SUPPORT OF A SEARCH WARRANT**

I, Tyler J. Sherman, with the Cleveland Field Office of the United States Postal Inspection Service (hereinafter “USPIS”), having first been duly sworn according to law, hereby depose and say:

1. As a United States Postal Inspector, I am an investigative law enforcement officer of the United States of America within the meaning of Title 18, United States Code, Section 2510(7). I am empowered by law to conduct investigations of, and to make arrests for, offenses related to the United States Postal Service (hereinafter “USPS”) and the mails, as authorized by Title 18, United States Code, Section 3061.

2. I have been employed by the USPIS since May 2019 and am presently assigned to the Cleveland Field Office Contraband Interdiction and Investigations team, which investigates the mailing of illegal narcotics and their proceeds. I have received training in the detection and investigation of prohibited mailing offenses. I am familiar with drug traffickers’ methods of operation, especially as they relate to the Postal Service, including the storage, transportation, and distribution of drugs, the transfer and collection of money which represents the proceeds of drug trafficking, and money laundering.

3. Your Affiant knows based on training and experience that U.S. Mail is often used by narcotic traffickers to transport controlled substances and proceeds of narcotics sales. Your Affiant knows based on training and experience that U.S. Mail is commonly used to transport controlled substances and proceeds of narcotic sales because narcotic traffickers can track the parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

4. On May 31, 2023, your Affiant identified in Postal Service databases USPS Priority Mail package bearing tracking no. 9405536104262884274462 (hereinafter referred to as the “**Subject Parcel 1**”), addressed to recipient S.P PRODUCTIONS, 4012 VENICE RD LOT 18, SANDUSKY, OH 44870, bearing a return address to MOTORSPORT AUTO – THE Z-STORE, 1139 W COLLINS AVE, ORANGE, CA 92867, as a suspected narcotics parcel based on several factors including but not limited to origin, method of mailing, and size. Subsequently, the USPIS obtained **Subject Parcel 1** on June 1, 2023, from the USPS Cleveland Processing and Distribution Center (PDC) 44101, to determine the mailability of the parcel.

5. The **Subject Parcel 1** is further described as a brown cardboard box, weighing approximately 9 pounds, measuring approximately 8 1/4” X 10 1/4” X 10”, and listing \$32.38 postage. The **Subject Parcel 1** was mailed from Orange, CA 92867 on May 30, 2023.

6. The **Subject Parcel 1** contained postage that was purchased through a third-party postage provider. Your Affiant knows, based on previous narcotics seizures using similar postage, that this third-party postage provider is commonly used by individuals who mail illegal narcotics via the USPS. Your Affiant knows that Cleveland, Ohio Postal Inspectors have interdicted over one hundred parcels paid with the same third-party postage and every time a parcel search warrant was obtained, Inspectors identified illegal contraband contained inside.

7. Your Affiant made inquiries within CLEAR, an electronic open-source database utilized by law enforcement that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, and was

unable to associate MOTORSPORT AUTO – THE Z-STORE, 1139 W COLLINS AVE, ORANGE, CA 92867 on the **Subject Parcel 1**. However, CLEAR was able to locate a MOTORSPORT INDUSTRIES INC AT 1139 W COLLINS AVE, ORANGE, CA 92867.

8. Furthermore, CLEAR was unable to associate S. P PRODUCTIONS at 4012 VENICE RD LOT 18, SANDUSKY, OH 44870 on the **Subject Parcel 1**. Furthermore, CLEAR was unable to locate a “SP Productions,” or a “S.P. Productions” in Sandusky, Ohio.

9. On June 2, 2023, the **Subject Parcel 1** was placed into a blind lineup underneath a wood box surrounded by four other wood boxes of the same approximate shape, size, and color. Narcotic detection canine “Maty”, handled by Officer Kurt Schroeder of the Perrysburg Township Police Department was allowed to examine the lineup inside the Perrysburg Township Police Department’s sally port. Officer Schroeder and canine Maty had no prior knowledge of what wood box the **Subject Parcel 1** was under prior to conducting the examination. According to Officer Schroeder, Maty gave a positive indication on the wood box containing the **Subject Parcel 1** and none of the other wood boxes. According to Officer Schroeder, this positive indication meant Maty detected the odor of an illegal drug emanating from the wood box containing the **Subject Parcel 1**.

10. Officer Schroeder has been state certified as a dual-purpose canine handler since 2020. He and his dual-purpose canine Maty have been working together since September 2020. Officer Schroeder and canine Maty completed 240 hours of a state-certified training program at Gold Shield Canine in Columbus, OH, under Certified

Master Trainer Dan Bowman. Officer Schroeder and canine Maty were both certified in October 2020 by the Ohio Peace Officers Training Academy. Officer Schroeder and canine Maty have recertified each year since. The latest of which being in July 2022. Officer Schroeder and canine Maty train weekly consisting of various types of narcotics detection scenarios consisting of various narcotics hides; to include boats, vehicles, buildings, rooms, and packages/parcels.

11. Canine Maty is a certified and trained dual purpose canine, which includes narcotics detection. Canine Maty is certified and trained to detect the odor of marijuana, heroin, cocaine, and methamphetamine, and their derivatives.

12. On June 1, 2023, your Affiant identified in Postal Service databases USPS Priority Mail package bearing tracking no. 9405536106089894338322 (hereinafter referred to as the “**Subject Parcel 2**”), addressed to recipient S. P PRODUCTIONS, 4012 VENICE RD LOT 18, SANDUSKY, OH 44870, bearing a return address to QUENTON FORD, 9393 TIDWELL RD, HOUSTON, TX 77078, as a suspected narcotics parcel based on several factors including but not limited to origin, method of mailing, and size. Subsequently, the USPIS obtained **Subject Parcel 2** on June 1, 2023, from the USPS PDC 44101, to determine the mailability of the parcel.

13. The **Subject Parcel 2** is further described as a brown cardboard box, weighing approximately 1.5 pounds, measuring approximately 11 1/4” X 8 3/4” X 5.5”, and listing \$13.02 postage. The **Subject Parcel 2** was mailed from Houston, TX 77078 on May 31, 2023.

14. Your Affiant made inquiries within CLEAR, an electronic open-source database utilized by law enforcement that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, and was unable to associate QUENTON FORD in Houston, Texas and was unable to associate QUENTON FORD at 9393 TIDWELL RD, HOUSTON, TX 77078.

15. CLEAR was unable to associate S.P PRODUCTIONS at 4012 VENICE RD LOT 18, SANDUSKY, OH 44870 on the **Subject Parcel 2**. Furthermore, CLEAR was unable to locate a “SP Productions,” or a “S.P Productions” in Sandusky, Ohio.

16. On June 2, 2023, the **Subject Parcel 2** was placed into a blind lineup underneath a wood box surrounded by five other wood boxes of the same approximate shape, size, and color. Narcotic detection canine “Maty”, handled by Officer Kurt Schroeder of the Perrysburg Township Police Department was allowed to examine the lineup inside the Perrysburg Township Police Department’s sally port. Officer Schroeder and canine Maty had no prior knowledge of what wood box the **Subject Parcel 2** was under prior to conducting the examination. According to Officer Schroeder, Maty gave a positive indication on the wood box containing the **Subject Parcel 2** and none of the other wood boxes. According to Officer Schroeder, this positive indication meant Maty detected the odor of an illegal drug emanating from the wood box containing the **Subject Parcel 2**.

17. Furthermore, on February 23, 2023, your Affiant obtained and executed a federal search warrant, case no. 3:23MJ5064, from the Honorable Judge Darrell A. Clay of the Northern District of Ohio for a USPS Priority mail parcel bearing tracking no. 9405511206223885144646 addressed to recipient S.P. Productions, 4012 Venice Rd. Lot

18, Sandusky, Ohio 44870. Located inside the USPS Priority mail parcel bearing tracking no. 9405511206223885144646 was approximately 2,347.341 grams of suspected marijuana.

18. Your affiant knows based on his training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, which narcotic canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.

19. Based on the information contained herein, your Affiant maintains there is probable cause to believe that the U.S. Postal Service Priority Mail packages, **Subject Parcel 1**, and **Subject Parcel 2**, addressed to recipient S.P. PRODUCTIONS, 4012 VENICE RD LOT 18, SANDUSKY, OH 44870, contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).



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TYLER J. SHERMAN  
U.S. POSTAL INSPECTOR

Sworn to via telephone on this 2<sup>nd</sup> day of  
June 2023 after submission by reliable  
electronic means Fed.R.Crim.P. 4.1 and 41(d)(3).



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JONATHAN D. GREENBERG  
U. S. MAGISTRATE JUDGE

